

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
	:	
Andre Harris	:	No. 19-15608-MDC
Debtor	:	

RESPONSE TO MOTION OF J.P. MORGAN MORTGAGE ACQUISITION TRUST
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. Debtor avers all payments have been made and is requesting Movant to provide their full accounting in an effort to review how his payments were applied. The debtor will provide proof of all post-petition payments from October 2019 going forward. In the event that debtor has missed payments, he is requesting the chance to catch up.
8. Denied.
9. Debtor is unsure of the same.
10. Denied.
11. No objection.
12. No response required.

WHEREFORE, the Debtor respectfully requests that the Movant's Motion for Relief be DENIED.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 9/10/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of J.P Morgan Mortgage Acquisition Trust
bkgroup@kml1lawgroup.com

Dated: 9/10/20

/s/ David M. Offen
David M. Offen
Attorney for Debtor